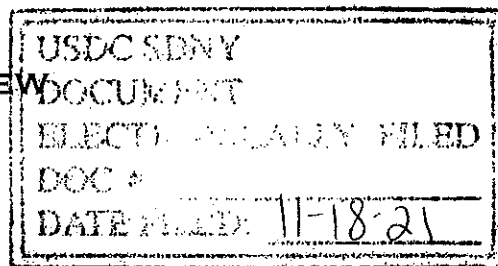


LAW OFFICE OF AMY JANE AGNEW

Honorable Loretta A. Preska
Senior Justice, United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007



November 17, 2021

VIA ECF

Re: *Milburn, et al. v. Coughlin, et al.*, 79-cv-5077
Schedule Adjustment and Facility Inspection

Dear Judge Preska:

Plaintiffs' counsel writes to respectfully request a slight adjustment to the current scheduling order. (Dkt. No. 681.) Due to some delays in Defendants' production of medical records, Plaintiffs requested an additional week for our expert to tender his initial report. Defendants have consented. These changes will not affect the timely submission of papers pursuant to the current order, only some interim deadlines. The new proposed deadlines are as follows:

Submission of Expert Initial Reports:	December 3, 2021
Exchange of Expert Rebuttal Reports:	December 16, 2021
Close of Expert Discovery:	December 21, 2021
Plaintiffs File Opposition and Cross-Motion Papers:	December 24, 2021
Defendants File Reply Brief:	January 12, 2021

Plaintiffs also respectfully bring to the Court's attention that they will be performing inspections of Green Haven along with their expert, Dr. Homer Venters, on November 19, 2021. We noticed these inspections in September of 2021 and no objections were received from Defendants. However, earlier this week, Defendants lodged some tepid protests to Plaintiffs' inspection of the Secured Housing Unit (SHU) and the Regional Mental Health Unit (RMHU) due to vague security concerns. This office has been quite clear with Defendants that the inspections must move forward given the breadth of the issues in the case and the availability of Plaintiffs' expert and counsel. If required, we will appeal to the Court for intervention on Friday, though we hope to avoid any imposition.

Very truly yours,

/s/ AJ Agnew

Amy Jane Agnew, Esq.

11/17/21

SO ORDERED

Loretta A. Preska
LORETTA A. PRESKA
UNITED STATES DISTRICT JUDGE